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September 26, 2023

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Sanket J. Bulsara, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13C South  
Brooklyn, NY 11201-1804

**Re: Fidan, et ano. v. Istanbul Rego Park Inc., et al.**  
**Case No.: 1:22-cv-2252 (ENV) (SJB)**  
**MLLG File No.: 101-2022**

Dear Judge Bulsara:

This office represents the Defendants in the above-referenced case. Defendants write jointly with Plaintiffs to respectfully request a sixty (60) day extension of time to complete discovery due to continuing settlement discussions as further outlined below.

Pursuant to ¶ II(A) of this Court's Individual Practices, the parties submit that: (i) the original date to complete discovery is September 30, 2023; (ii) the reason for the requested extension is because the parties participated in a virtual mediation on Thursday, September 21, 2023, are continuing to discuss resolution, and have agreed to continue mediation on Thursday, October 12, 2023; and (iii) the Plaintiffs join in the request for an extension of time.

The parties respectfully submit that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). In addition, the parties respectfully submit that the request is in line with the Federal Rules of Civil Procedure (hereinafter the "Rules" or "Rule"), which requires that the Rules be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding. See Fed. R. Civ. P. 1 (emphasis added).

Accordingly, this Court should exercise its discretion in favor of granting the request for an extension of time.

The parties thank this Court for its time, attention, and continued courtesies in this case.

Dated: Lake Success, New York  
September 26, 2023

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

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